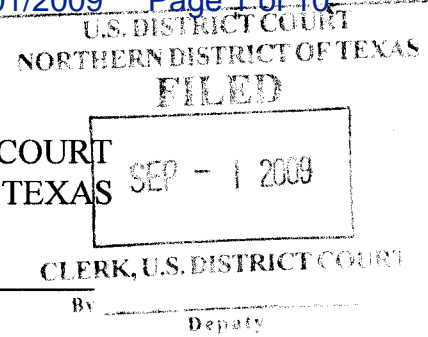


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION



UNITED STATES OF AMERICA

v.

BYRON DALE JOHNSON (1)
KELLY MARIE JELLISON (2)

§
§
§
§
§
§

Criminal No.

2 - 09 CR - 055 - J

INDICTMENT

The Grand Jury Charges:

Count One

Laundering of Monetary Instruments and Aiding and Abetting
(18 U.S.C. §§ 1956(a)(1)(A)(i), 1961(1) and 2)

On or about September 21, 2005, in the Amarillo Division of the Northern District of Texas, and elsewhere, the defendants **Byron Dale Johnson** and **Kelly Marie Jellison**, did knowingly and willfully conduct a financial transaction affecting interstate and foreign commerce, to wit, the transfer of a check numbered 3041 in the amount of \$10,000 drawn on a Bank of America account titled "B.J. Enterprise" to Post Oak Motor Cars Ltd., to secure the purchase of a 2007 Flying Spur Bentley automobile, which involved the proceeds of specified unlawful activity, that is, Coercion and Enticement, in violation of 18 U.S.C. § 2422(a), and Racketeering Activity as defined in 18 U.S.C. § 1961(1), with the intent to promote the carrying on of specified unlawful activity, to wit: Coercion and Enticement, in violation of 18 U.S.C. § 2422(a), and Racketeering

Activity as defined in 18 U.S.C. § 1961(1), and that while conducting and attempting to conduct the financial transaction, **Byron Dale Johnson** and **Kellie Marie Jellison**, knew that the money involved in the financial transactions represented the proceeds of some form of unlawful activity.

All in violation of 18 U.S.C. §§ 1956(a)(1)(A)(i), 1961(1) and 2.

Count Two

Laundering of Monetary Instruments and Aiding and Abetting
(18 U.S.C. §§ 1956(a)(1)(A)(i), 1961(1) and 2)

From on or about March 1, 2005, to on or about May 7, 2007, in the Amarillo Division of the Northern District of Texas, and elsewhere, the defendants **Byron Dale Johnson** and **Kelly Marie Jellison**, did knowingly and willfully conduct financial transactions affecting interstate and foreign commerce, to wit, the transfer of monies from an account numbered 4780723632 belonging to **Byron Dale Johnson** and **Kelly Marie Jellison**, at Bank of America to Countrywide Home Loans and HSBC, for the purpose of paying the mortgage on a home located at 2723 River Legacy Drive, Arlington, Texas, which involved the proceeds of specified unlawful activities, that is, Coercion and Enticement, in violation of 18 U.S.C. § 2422(a), and Racketeering Activity as defined in 18 U.S.C. § 1961(1), with the intent to promote the carrying on of specified unlawful activities, to wit: Coercion and Enticement, in violation of 18 U.S.C. § 2422(a), and Racketeering Activity as defined in 18 U.S.C. § 1961(1), and that while conducting and attempting to conduct the financial transactions knew that the money involved in the financial transactions, that is, funds in the amount of approximately \$68,494.00 represented the proceeds of some form of unlawful activity.

All in violation of 18 U.S.C. §§ 1956(a)(1)(A)(i), 1961(1) and 2.

Count Three

Laundering of Monetary Instruments and Aiding and Abetting
(18 U.S.C. §§ 1956(a)(1)(A)(i), 1961(1) and 2)

From on or about September 8, 2005, to on or about October 15, 2007, in in the Amarillo Division of the Northern District of Texas, and elsewhere, the defendants **Byron Dale Johnson** and **Kelly Marie Jellison**, did knowingly and willfully conduct financial transactions affecting interstate and foreign commerce, to wit, the transfer of monies in payment of advertising to Darkside Productions Inc. a/k/a EROS, from accounts belonging to **Byron Dale Johnson** and **Kelly Marie Jellison**, at Bank of America, People's Federal Credit Union, Amarillo Texas, and American Express, which involved the proceeds of specified unlawful activities, that is, Coercion and Enticement, in violation of 18 U.S.C. § 2422(a), and Racketeering Activity as defined in 18 U.S.C. § 1961(1), with the intent to promote the carrying on of specified unlawful activities, to wit: Coercion and Enticement, in violation of 18 U.S.C. § 2422(a), and Racketeering Activity as defined in 18 U.S.C. § 1961(1), and that while conducting and attempting to conduct the financial transactions knew that the money involved in the financial transactions, that is, funds in the amount of approximately \$9,766.00 represented the proceeds of some form of unlawful activity.

All in violation of 18 U.S.C. §§ 1956(a)(1)(A)(i), 1961(1) and 2.

Count Four

Laundering of Monetary Instruments and Aiding and Abetting
(18 U.S.C. §§ 1956(a)(1)(A)(i), 1961(1) and 2)

From on or about May 3, 2004, to on or about July 27, 2008, in the Amarillo Division of the Northern District of Texas, and elsewhere, the defendants **Byron Dale Johnson** and **Kelly Marie Jellison**, did knowingly and willfully conduct financial transactions affecting interstate and foreign commerce, to wit, the transfer of monies from merchant credit card accounts and funding company accounts into Bank of America operating accounts controlled by **Byron Dale Johnson** and **Kelly Marie Jellison**, which involved the proceeds of specified unlawful activities, that is, Coercion and Enticement, in violation of 18 U.S.C. § 2422(a), and Racketeering Activity as defined in 18 U.S.C. § 1961(1), with the intent to promote the carrying on of specified unlawful activities, to wit: Coercion and Enticement, in violation of 18 U.S.C. § 2422(a), and Racketeering Activity as defined in 18 U.S.C. § 1961(1), and that while conducting and attempting to conduct the financial transactions knew that the money involved in the financial transactions, that is, funds in the amount of approximately \$878,696.19 represented the proceeds of some form of unlawful activity.

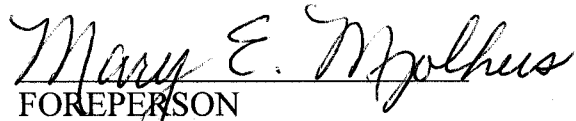
All in violation of 18 U.S.C. §§ 1956(a)(1)(A)(i), 1961(1) and 2.

Count Five
Conspiracy to Launder Monetary Instruments
(18 U.S.C. § 1956(h))

From on or about May 1, 2004, to on or about August 1, 2008, in the Amarillo Division of the Northern District of Texas, and elsewhere, the defendants **Byron Dale Johnson** and **Kelly Marie Jellison**, did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury to commit offenses against the United States, in violation of Title 18, United States Code, Section 1956, to wit: to knowingly and willfully conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, to wit, the transfer of monies for the purpose of acquiring an automobile, a residence, and advertising, and the transfer of monies from merchant credit card accounts and funding company accounts to Bank of America operating accounts controlled by **Byron Dale Johnson** and **Kelly Marie Jellison**, and said financial transactions involved proceeds of specified unlawful activities, that is, Coercion and Enticement, in violation of 18 U.S.C. § 2422(a), and Racketeering Activity as defined in 18 U.S.C. § 1961(1), with the intent to promote the aforementioned specified unlawful activities, and that while conducting and attempting to conduct such financial transactions knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 1961(1).

In violation of 18 U.S.C. § 1956(h).

A TRUE BILL


FOREPERSON

JAMES T. JACKS
UNITED STATES ATTORNEY



VICKI LAMBERSON
Assistant United States Attorney
Texas State Bar No. 10081500
500 South Taylor, Suite 300, Box 238
Amarillo, Texas 79101
Telephone: 806.324.2356
Facsimile: 806.324.2399
Email: vicki.lamberson@usdoj.gov

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

THE UNITED STATES OF AMERICA

VS.

BYRON DALE JOHNSON (1)
KELLY MARIE JELLISON (2)

INDICTMENT

18 U.S.C. §§ 1956(a)(1)(A)(i), 1961(1) and 2
Laundering of Monetary Instruments,
Aiding and Abetting

18 U.S.C. § 1956(h)
Conspiracy to Launder Monetary Instruments

(5 Counts)

A true bill rendered:

AMARILLO

Filed in open court this 15 day of September, A.D. 2009.

Warrant to Issue each Defendant

Delegada Smith Clerk

Mary Kay Johnson
UNITED STATES DISTRICT JUDGE
NO PENDING CRIMINAL COMPLAINT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

Related Case Information

Superseding Indictment: ☐ Yes ☒ No New Defendant: ☒ Yes ☐ No
 Pending CR Case in NDTX: ☐ Yes ☒ No If Yes, number: _____
 Search Warrant Case Number _____ N/A
 R 20 from District of _____ N/A
 Magistrate Case Number _____ N/A

1. Defendant Information

Juvenile: ☐ Yes ☒ No

If Yes, Matter to be sealed:

☐ Yes ☒ No

___ Summons ☒ Warrant ___ In Custody

2 - 0 9 C R - 0 5 . 5 - J

Defendant Name Byron Dale Johnson (1)

Alias Name _____

Address _____

County in which offense was committed: _____

Potter Cnty

2. U.S. Attorney Information

AUSA Vicki Lamberson

Bar # 10081500

3. Interpreter

☐ Yes ☒ No

If Yes, list language and/or dialect: _____

4. Location Status

Arrest Date _____

☐ Already in Federal Custody as of _____ in _____

☐ Already in State Custody

☐ On Pretrial Release

5. U.S.C. Citations

Total # of Counts as to This Defendant: 5 ☐ Petty ☐ Misdemeanor ☒ Felony

Citation	Description of Offense Charged	Count(s)
18 USC §§1956(a)(1)(A)(i), 1961(1) and 2	Laundering of Monetary Instruments, Aiding and Abetting	1-4
18 USC 1956(h)	Conspiracy to Launder Monetary Instruments	5
_____	_____	_____
_____	_____	_____
_____	_____	_____

(May be continued on reverse)

Date 8-14-09

Signature of AUSA: _____

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

Related Case Information

Superseding Indictment: ☐ Yes ☒ No New Defendant: ☒ Yes ☐ No
 Pending CR Case in NDTX: ☐ Yes ☒ No If Yes, number: _____
 Search Warrant Case Number _____ N/A
 R 20 from District of _____ N/A
 Magistrate Case Number _____ N/A

1. Defendant Information

Juvenile: ☐ Yes ☒ No

If Yes, Matter to be sealed:

☐ Yes ☒ No

___ Summons ☒ Warrant ___ In Custody

2 - 09 CR - 055 - J

Defendant Name Kelly Marie Jellison (2)

Alias Name _____

Address _____

County in which offense was committed: Potter Cnty

2. U.S. Attorney Information

AUSA Vicki Lamberson

Bar # 10081500

3. Interpreter

☐ Yes ☒ No

If Yes, list language and/or dialect: _____

4. Location Status

Arrest Date _____

☐ Already in Federal Custody as of _____ in _____

☐ Already in State Custody

☐ On Pretrial Release

5. U.S.C. Citations

Total # of Counts as to This Defendant: 5 ☐ Petty ☐ Misdemeanor ☒ Felony

Citation	Description of Offense Charged	Count(s)
18 USC §§1956(a)(1)(A)(i), 1961(1) and 2	<u>Laundrying of Monetary Instruments, Aiding and Abetting</u>	<u>1-4</u>
18 USC 1956(h)	<u>Conspiracy to Launder Monetary Instruments</u>	<u>5</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

(May be continued on reverse)

Date

8-14-09

Signature of AUSA:

